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**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF GEORGIA
VALDOSTA DIVISION**

UNITED STATES OF AMERICA	:	CRIMINAL NO. 7:24-CR- <u>21</u>
	:	
v.	:	VIOLATIONS:
MARIARLENE BROWN a/k/a	:	18 U.S.C. § 1349
MATI MOM,	:	18 U.S.C. § 1344(2)
WILLIAM ALLEN	:	18 U.S.C. § 982(a)(2)(A)
ROBERTS a/k/a ALSACE,	:	
FREDERICK PERNELL GREEN,	:	
THOMAS CHRISTOPHER	:	
MITCHELL,	:	
DAVONTAY WISEMAN a/k/a VONN,	:	
CALVIN DEWAYNE MCKEITHEN	:	
a/k/a SUPA,	:	<u>FILED UNDER SEAL</u>
DEWAYNE RASHEEN BUTLER a/k/a	:	
GUWAPO,	:	
TYLER KHERSHAD JONES a/k/a	:	
LA CLIPPERS,	:	
	:	
Defendants.	:	
	:	

THE GRAND JURY CHARGES:

BACKGROUND

At all times relevant to this indictment:

1. Truist Bank was a financial institution, whose deposits were insured by the Federal Deposit Insurance Corporation.
2. MARIARLENE BROWN was an employee of Truist Bank in Valdosta, Georgia.

COUNT ONE
(Conspiracy to Commit Bank Fraud)

3. The Grand Jury re-alleges and incorporates by reference Paragraphs One through Two of this Indictment as if fully set forth herein.

4. Beginning from at least as early as November 2021, and continuing until in or about December 2022, the exact dates unknown to the Grand Jury, in the Valdosta Division of the Middle District of Georgia, and elsewhere within the jurisdiction of this Court, the defendants,

**MARIARLENE BROWN,
WILLIAM ALLEN ROBERTS,
FREDERICK PERNELL GREEN,
THOMAS CHRISTOPHER MITCHELL,
DAVONTAY WISEMAN,
CALVIN DEWAYNE MCKEITHEN,
DEWAYNE RASHEEN BUTLER, and
TYLER KHERSHAD JONES,**

and others known and unknown to the Grand Jury, did knowingly and willfully combine, conspire, confederate, agree, and have a tacit understanding with each other to knowingly and willfully execute and attempt to execute a scheme and artifice to obtain moneys, funds, credits, assets, securities, and other property owned by, and under the custody and control of, Truist Bank, a federally insured financial institution, by means of false and fraudulent pretenses, representations, and promises. All in violation of Title 18, United States Code, Section 1344(2).

Object of the Conspiracy

5. The object of the conspiracy was for the defendants to cause checks unlawfully obtained and fraudulently produced by ROBERTS to be deposited into Truist Bank customers' accounts, with the assistance of BROWN, so that ROBERTS, GREEN, MITCHELL, WISEMAN, MCKEITHEN, BUTLER, and JONES could withdraw cash upon the accounts from the deposits for their personal benefit.

Manner and Means

6. ROBERTS unlawfully obtained check information that he did not have lawful authority to possess and use.

7. ROBERTS would use the check information to produce fraudulent checks (“the fraudulent checks”).

8. GREEN, MITCHELL, WISEMAN, MCKEITHEN, BUTLER, and JONES would compile debit cards and account information from Truist Bank customers, both known and unknown to the Grand Jury, and provide that to ROBERTS for the purpose of depositing the fraudulent checks into the customers’ accounts.

9. ROBERTS would write the fraudulent checks in various sums of money to Truist Bank customers enlisted by GREEN, MITCHELL, WISEMAN, MCKEITHEN, BUTLER, and JONES.

10. BROWN assisted in the coordination of depositing the fraudulent checks at ROBERTS’ request into the Truist Bank customers’ accounts.

11. BROWN edited and provided Truist Bank customers’ account information to ROBERTS, GREEN, MITCHELL, WISEMAN, MCKEITHEN, BUTLER, and JONES.

12. By providing and editing the account information, BROWN allowed for the fraudulent checks to be deposited into the accounts and for cash from the accounts to be withdrawn by ROBERTS, GREEN, MITCHELL, WISEMAN, MCKEITHEN, BUTLER, and JONES for their personal benefit.

13. BROWN would be paid by ROBERTS for depositing the fraudulent checks and providing and editing the customers’ account information so that the fraudulent checks could be deposited and cash could be withdrawn from the accounts.

All in violation of Title 18, United States Code, Section 1349.

FORFEITURE NOTICE

(18 U.S.C. § 982(a)(2) – Criminal Forfeiture)

1. The allegation contained in Count One of this Indictment is hereby re-alleged and incorporated by reference into this Notice for the purpose of alleging forfeiture to the United States of America, pursuant to the provisions of Title 18, United States Code, Section 982(a)(2)(A).

2. Upon conviction of the offense in violation of Title 18, United States Code, Section 1349, in connection with Title 18, United States Code, Section 1344(2), set forth in Count One of this Indictment, the defendants,

**MARIARLENE BROWN,
WILLIAM ALLEN ROBERTS,
FREDERICK PERNELL GREEN,
THOMAS CHRISTOPHER MITCHELL,
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DEWAYNE RASHEEN BUTLER, and
TYLER KHERSHAD JONES,**

shall forfeit to the United States of America pursuant to Title 18, United States Code, Section 982(a)(2)(A), any property constituting, or derived from, proceeds obtained directly or indirectly, as a result of such violation(s), including, but not limited to a money judgment in an amount to be determined.

3. If any of the property subject to forfeiture, as a result of any act or omission of the defendant:

- (a) cannot be located upon exercise of due diligence;
- (b) has been transferred, sold to or deposited with, a third person;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or

(e) has been commingled with other property which cannot be subdivided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b)(1).

All pursuant to Title 18, United States Code, Section 982.

A TRUE BILL.

s/ Foreperson of the Grand Jury
FOREPERSON OF THE GRAND JURY

Presented by:

PETER LEARY
UNITED STATES ATTORNEY

Hannah M. Couch
HANNAH M. COUCH
ASSISTANT UNITED STATES ATTORNEY

Filed in open court this 11 day of June, AD 2024.

C. Austin
Deputy Clerk